

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MONICA ABBOD, §

Plaintiff, §

vs. §

HEALTH INSURANCE
INNOVATIONS, INC., §

Defendant. §

Civil Action No. 4:19-cv-01035

**DECLARATION OF CHRISTINE GILLIS IN SUPPORT OF DEFENDANT
HEALTH INSURANCE INNOVATIONS, INC.'S MOTION TO DISMISS**

Pursuant to 28 U.S.C. § 1746, I, Christine Gillis, declare as follows:

1. I am Senior Compliance Manager at Health Insurance Innovations, Inc. ("HII").
2. I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, I could and would testify competently thereto.
3. I have worked with HII since May 2013 and was appointed to my current position in approximately October 2018.
4. HII is a developer, distributor, and virtual administrator of cloud-based individual health and family insurance plans and supplemental products.
5. I am familiar with the lawsuit filed by Monica Abboud against HII in the District Court for the Southern District of Texas, Case No. 4:19-cv-01035.
6. In my capacity as Senior Compliance Manager, I am knowledgeable about the business practices and operations pertinent to the allegations in the Complaint filed in this lawsuit.
7. HII is a Delaware corporation that maintains its principal place of business at 15438 N. Florida Avenue, Suite 201, Tampa, Florida 33613.

EXHIBIT A

8. In 2015, HII registered as a foreign corporation authorized to do business in the state of Texas, and maintains a designated registered agent in the state of Texas to accept service of process.

9. HII does not now nor has it ever maintained corporate offices in the state of Texas.

10. HII does not own any real property or maintain any bank account in the state of Texas.

11. As an organization, HII has two hundred fifteen (215) employees, thirty-eight (38) of which are located in the state of Texas and employed by American Service Insurance Agency, LLC (“ASIA”).

12. ASIA is a limited liability company formed under the laws of the state of Texas and maintains its principal place of business in the state of Texas.

13. Health Plan Intermediaries Holdings, LLC (“HPIH”) is a limited liability company formed under the laws of the state of Delaware.

14. On August 8, 2014, HPIH acquired all of the issued and outstanding membership interests in ASIA, which is now a wholly-owned subsidiary of HPIH.

15. ASIA is an entirely separate and distinct corporate entity from HPIH.

16. HPIH is a wholly-owned subsidiary of HII.

17. HPIH is an entirely separate and distinct corporate entity from HII.

18. In 2018, HII’s consolidated revenues were approximately \$351,097,000, of which approximately \$707,541 is attributable to business in the state of Texas.

19. HII maintains an informative business website with the URL www.hiiquote.com. This website is generally available worldwide, although it is not directed specifically to residents of Texas and does not specifically solicit business from the state of Texas.

20. HII has no physical infrastructure or ability to initiate telephone calls from within the state of Texas.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of May, 2019, at Tampa, Florida.



Christine Gillis